

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

DAVID DEVANEY, SR. et al.

Criminal No. 4:22-CR-213-P

NOTICE OF EXPERT TESTIMONY

TO THE HONORABLE MARK T. PITTMAN, U.S. DISTRICT JUDGE:

The United States of America in its Notice of Expert Testimony, and would respectfully show this Court as follows:

The government expects to call HSI Agent Mike McCurdy, Johnson County Sheriff's Office Deputies Curran Massey and Andrew Riggs, Burleson Police Department Officer Larry Sparks, and/or another qualified expert, to testify from his expertise on techniques and processes unique to drug trafficking. More specifically, one of the designated experts, or another qualified expert will testify about:

- (1) the use and utility of couriers to transport narcotics;
- (2) the street-value of methamphetamine, and other relevant illegal drugs;
- (3) the common transportation routes of methamphetamine from Mexico to and throughout the United States;
- (4) the use of multiple cellular telephones including the frequent disposal of such;
- (5) the use of other drug trafficking paraphernalia (e.g., digital scales, money counters, baggies);
- (6) the use of coded language to disguise the fact that drug dealers are talking about distributing drugs;

- (7) common business practices between and amongst drug dealers (e.g., the concept of “fronting” drugs or delivering drugs to another person on consignment; the concept of “vouching” for another person in the context of purchasing drugs from a source of supply; the accrual of a drug-debt for a person/courier who loses drugs due to law enforcement intervention or otherwise); and
- (8) the use of residences and/or other establishments (e.g. “game rooms”) to conduct drug transactions between and amongst a wide and varying range of drug distributors and drug customers.

The government expects to call KeiSharra Eldridge, Angela Cassady, Carissa Stark-Hopenwasser, Marsha Cole, Pauline Orlando, Kiana Henderson, Phanneth Som, and Charity Foreman, and/or another qualified chemist(s), from the DEA South Central Laboratory in Dallas, Texas, to testify as to his/her opinion regarding the identification of narcotics seized in this case.

Respectfully Submitted,

CHAD E. MEACHAM  
UNITED STATES ATTORNEY

*s/ Shawn Smith*

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SHAWN SMITH

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 29, 2022, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

*s/ Shawn Smith*

SHAWN SMITH

Assistant United States Attorney